

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: 6/20/23
--

CAMILLE M. ABATE, ESQ.
ATTORNEY AT LAW

Of Counsel, Nicholas Goodman & Associates
333 Park Avenue South, Suite 3A, New York, NY 10010
TEL: (212) 227-9003 • FAX: (212) 937-2112

MEMO ENDORSED

June 15, 2023

6/20/23

VIA ECF

Hon. Colleen McMahon
Chief United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Permission to travel
AS requested herein
is Denied.

Re: Request for Permission to Travel for Kevin McCarron
United States v. Cahill, et al., 20 Cr. 521 (CM)

Colleen McMahon

Dear Judge McMahon:

Kevin McCarron, having been sentenced by Your Honor to a term of 60 days' imprisonment, and scheduled to surrender to the Marshals or the Bureau of Prisons on September 18, 2023, would like to take a trip to see his cousin, who attends the Naval Academy in Annapolis, play football in a Notre Dame vs. Navy game that is being played in Dublin, Ireland.

The trip would be from August 23 through August 29, 2023 – three weeks prior to his surrender. He had his knee surgery in early June, and his doctors have stated that he would be physically able to make this trip in late August. He would still surrender as directed to whatever facility is designated, on September 18, 2023.

I have spoken to Pretrial Services Officer Robert Stehle, who supervises Mr. McCarron, about their position. Mr. Stehle reports, via text, as follows: "Pretrial in the SDNY takes no position on foreign travel. However, **I have no concern** and he has been compliant." (Emphasis added.) On the other hand, the government opposes permission for this trip.

Since October 2020, when Mr. McCarron was first arrested for this case, he has been fully compliant with Pretrial and has scrupulously adhered to all Pretrial and Court orders. While it may be unusual for a sentenced defendant to take a trip of this nature before surrender, I respectfully submit that there is no risk of flight with Mr. McCarron, whose entire family resides here.

Sincerely,

s/s Camille M. Abate

cc: AUSA's Jun Xiang, Marguerite Colson, and Frank Balsamello (via ECF)